UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

CORY HAMMOCK,

Plaintiff,

v.

MOVING STATE TO STATE LLC, NATALIE SCHMID, STATE TO STATE MOVING NY INC, STATE TO STATE MOVING GROUP LLC, MIKE NADEL a/k/a MICHAEL NADEL a/k/a MICKEY MILLER, MICHAEL NADEL a/k/a MICKEY MILLER, YARIN NADEL a/k/a YARIN NAZEL a/k/a JOE MILLER a/k/a NEW YORK JOE, DOES 2-6, PRIME STORAGE JAMAICA LLC, and PRIME GROUP HOLDINGS, LLC,

Defendants.

Case No: 1:18-CV-05628-SJ-ST

DECLARATION OF DMITRIY SHAKHNEVICH

DMITRIY SHAKHNEVICH, Esq., hereby declares as follows:

- 1. I am the attorney for certain of the Defendants of this Action in a separate matter concerning some of the same property, *United States v. Yarin Nadel et al*, Civil Action No. 1:19-cv-01578-MKB-CLP, and make this affirmation in support of the Plaintiff Corey Hammock's request to release property subject to an injunction by this Court
- 2. By Consent Order submitted to the Court in *U.S. v. Nadel*, and attached hereto, my client has agreed to return Mr. Hammock's property to his address in Utah.
- 3. To effectuate this agreement without violating the terms of any injunction in this Action, I support the Plaintiff's request to lift the injunction against the Defendants to allow the property to be returned to its owner.

4. No prior application has been made for the relief sought herein.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York

July 30, 2019

DMITRIY SHAKHNEVICH, ESQ.